

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
SOUTHERN DIVISION**

GUILLERMO BARAJAS and)	
others similarly situated,)	
)	
Plaintiffs,)	
v.)	Case No. 1:13-CV-107
)	
SEALTECH, INC., PI, INC., and)	Collier/Lee
HYDRA POOLS,)	
)	Jury Demanded
Defendants.)	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants, PI, Inc., Sealtech, Inc. and Hydra Pools (collectively "Defendants"), by and through counsel, respectfully move for the entry of Summary Judgment in their favor pursuant to Rule 56(c), Fed. R. Civ. P., as to all claims raised by Plaintiffs in their Amended Complaint [Doc. 7], and to dismiss this action in its entirety, with prejudice. In support of this Motion, Defendants respectfully refer the Court to their accompanying Memorandum in Support of this motion and supporting declarations, filed contemporaneously herewith and incorporated herein by reference.

Respectfully submitted this 11th day of August, 2014.

PI, Inc., Sealtech, Inc. and Hydra Pools

By: s/ Jerome D. Pinn
Jerome D. Pinn, BPR #17848
Edward H. Trent, BPR #30045
Wimberly Lawson Wright Daves & Jones, PLLC
550 West Main Avenue, Suite 900
P.O. Box 2231
Knoxville, TN 37901-2231
(865) 546-1000 (telephone)
(865) 546-1001 (fax)

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2014, a true and exact copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Jerome D. Pinn

Jerome D. Pinn